

EXHIBIT A

FILED: KINGS COUNTY CLERK 02/07/2017 04:12 PM

INDEX NO. 502518/2017

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 02/07/2017

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
DIONNE CHARLES and MCKENNIE CHARLES,

Plaintiff(s),

Index No.: 502518/2017

Date Filed: 2-7-17

-against-

COSTCO WHOLESALE CORPORATION,

Defendant(s).
-----X

SUMMONS

**PLAINTIFF DEMANDS
TRIAL BY JURY**

To The Above Named Defendant(s):


You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within thirty days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

The basis of venue is plaintiff's address

Plaintiff resides at 239 9th St, Brooklyn, NY 11215

Dated: New York, New York
February 07, 2017

Yours truly,


Michael B. Ronemus

RONEMUS & VILENSKY
Attorneys for Plaintiff(s)
112 Madison Avenue, 2nd Floor
New York, New York 10016
(212) 779-7070

TO: COSTCO,
976 Third Avenue
Brooklyn, NY 11232

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**VERIFIED
COMPLAINT**

**PLAINTIFF DEMANDS
TRIAL BY JURY**

Plaintiffs, by their attorneys RONEMUS & VILENSKY, complaining of the defendant
herein, respectfully shows to the Court, and allege as follows:

**AS AND FOR A FIRST CAUSE OF ACTION
ON BEHALF OF THE PLAINTIFF**

1. That this action falls within one or more of the exemptions set forth in CPLR §1602.
2. At all times hereafter mentioned, plaintiff DIONNE CHARLES (hereinafter CHARLES) was a resident of the County of Kings, State of New York
3. At all times mentioned, defendant COSTCO WHOLESALE CORPORATION (hereinafter COSTCO) was a corporation duly existing under and by virtue of the laws of the State of New York.
4. At all times mentioned COSTCO, was a foreign corporation duly authorized to conduct business in the State of New York.
5. At all times mentioned COSTCO was a corporation doing business in the State of New York.

6. At all times mentioned COSTCO owned certain premises and/or place of business located at 976 Third Ave, Brooklyn, NY.
7. At all times mentioned COSTCO operated certain premises and/or place of business located at 976 Third Ave, Brooklyn, NY.
8. At all times mentioned COSTCO managed certain premises and/or place of business located at 976 Third Ave, Brooklyn, NY
9. At all times mentioned, COSTCO maintained the premises and/or place of business located at 976 Third Ave, Brooklyn, NY
10. At all times mentioned, COSTCO, controlled the premises and/or place of business located at 976 Third Ave, Brooklyn, NY
11. At all times mentioned, it was the duty of COSTCO, its servants, agents or employees to provide for the safety, protection and well-being of persons lawfully present upon said premises and/or place of business located at 976 Third Ave, Brooklyn, NY
12. That on February 9, 2014, plaintiff CHARLES, was lawfully upon said premises and/or place of business located at 976 Third Ave, Brooklyn, NY
13. That on that date and at that location, CHARLES was caused to be injured while lawfully present on said premises.
14. CHARLES was caused to be injured due to the dangerous, hazardous and unsafe condition in said premises.
15. The injuries to CHARLES were solely the result of the negligence, carelessness, recklessness and wanton conduct of COSTCO.

16. COSTCO was aware of the dangerous nature of the premises as there had been multiple other people previously injured in a similar manner as CHARLES, yet COSTCO had not repaired the unsafe condition nor taken steps to prevent the accident suffered by CHARLES.
17. By reason of the foregoing, CHARLES has sustained serious permanent physical, emotional and financial injuries.
18. By reason of the foregoing, CHARLES has been damaged in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction of this matter.

AS AND FOR A SECOND CAUSE OF ACTION,

19. Plaintiffs beg to repeat each and every allegation heretofore set forth in the first cause of action with the same force and effect as if set forth herein at length.
20. Plaintiff MCKENNIE CHARLES is the wedded husband of plaintiff DIONNE CHARLES.
21. That by reason of the negligence and malpractice of the defendants herein plaintiff MCKENNIE CHARLES lost the society, companionship and consortium of his lawful wife.

WHEREFORE, Plaintiffs demand judgment against the defendant on the first and second causes of action in a sum of money having a present value that exceeds the jurisdictional limits

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of all lower courts which would otherwise have jurisdiction of this matter, along with punitive damages, all together with the costs and disbursements of this action.

Dated: New York, New York
February 07, 2017

Yours truly,



Michael B. Ronemus

RONEMUS & VILENSKY

Attorneys for Plaintiff(s)

112 Madison Avenue, 2nd Floor

New York, New York 10016

(212) 779-7070

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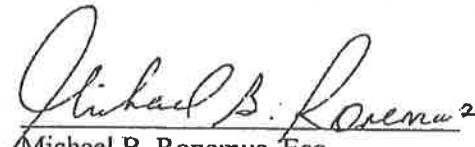
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STATE OF NEW YORK, COUNTY OF NEW YORK ss:

I, the undersigned, an attorney admitted to practice in the Courts of New York State, state under penalty of perjury that I am one of the attorneys for the plaintiff(s) in the within action; I have read the foregoing **VERIFIED COMPLAINT** and know the contents thereof; the same is true to my own knowledge, except as to the matters I believe to be true. The reason this verification is made by me and not by my client(s), is that my client(s) are not presently in the County where I maintain my offices. The grounds of my belief as to all matters not stated upon my own knowledge are the materials in my file and the investigation conducted by my office.

Dated: New York, New York
February 07, 2017


Michael B. Ronemus, Esq.